

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CHIEF HENRY V. TOBIN III, :
 :
 Plaintiff, :
 :
 v. : C.A. No. 04-1211 MPT
 :
 THOMAS P. GORDON, individually: :
 and in his official capacity; :
 SHERRY FREEBERRY, individually :
 and in her official capacity; :
 COLONEL JOHN L. CUNNINGHAM, :
 RETIRED, individually; :
 COLONEL DAVID F. MCALLISTER, :
 individually and in his :
 official capacity; and :
 NEW CASTLE COUNTY, :
 a municipal corporation, :
 :
 Defendants. :

PLAINTIFF'S MOTION FOR REASONABLE ATTORNEYS' FEES
OF THE LAW OFFICE OF JOHN M. LaROSA,
PURSUANT TO 42 U.S.C. § 1988 AND FED.R.CIV.P. 54¹

1. Pursuant to 42 U.S.C. § 1988 and Fed.R.Civ.P. 54,
plaintiff Moves that the Court make an award of attorneys' fees
of the Law Office of John M. LaRosa, for the successful entry of
judgment in this case.

2. Memoranda in support of this motion will proceed in
accord with the Jointly Stipulated Scheduling Order for

¹ Since the time records of plaintiff's counsel, The
Neuberger Firm, P.A. and the Law Office of John M. LaRosa were
kept using different billing systems, a separate motion and
memorandum is being filed by The Neuberger Firm, P.A. relating to
its attorneys' fees and costs.

Plaintiff's Fee Petition (D.I. 38) issued by the Court in its Order dated April 17, 2008.

Respectfully Submitted,

LAW OFFICE OF JOHN M. LaROSA

/S/ John M. LaRosa

JOHN M. LaROSA, ESQUIRE (#4275)

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Attorney for Plaintiff

Dated: May 1, 2008

CERTIFICATE OF SERVICE

I, John M. LaRosa, being a member of the bar of this Court do hereby certify that on May 1, 2008, I electronically filed this **PLEADING** with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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/s/ John M. LaRosa
JOHN M. LaROSA, ESQ. (#4275)